

March 4, 2008
Commissioners
Federal Communications Commission

RE: MB Docket No. 04-233

In 2007, KMTX AM participated in the NAB Crystal Awards competition for public service. While we were not one of the 10 winners, we did reach the lofty plateau of 50 finalists. The recognition was welcomed, but more than that, the journey of completing the entry revealed the extent to which our station and employees serve our community. The fact that the National Association of Broadcasters actually has a long-standing high-profile competition to award public service shows our industry's admirable intent. The number of remarkable entries from small to large markets exhibits the laudable completion.

In 2006, KMTX AM provided close to 18,600 minutes of local community events programming, Montana news, and local sports. On top of that, KMTX donated 5470 minutes of recorded public service announcements for 112 community groups or events for a value of \$49,232. As a group, our 9 full-time and 2 part-time employees actively served on 73 non-profit or community groups, serving on 4 boards of directors and 36 committees. The KMTX staff accumulated 1,716 hours of volunteer time in 2006.

In 2006, business, military, and preparedness organizations recognized 3 KMTX staff members for their public service with awards: Downtown Helena's Business Person of the Year; the Montana National Guard's highest civilian honor, the Outstanding Center of Influence Award; and the Sonny Stiger Wildland Fire Mitigation Award.

The cornerstone of our public service effort is our 10-minute live interview program, Headline Helena. In 2006, 164 people or groups were interviewed for a total of 2,600 minutes. This included over 16 different arts groups, 6 business groups, 12 family-related non-profits, 4 health care groups, 12 community groups, and 3 military-focused organizations.

Added to the above, KMTX had an on-site presence at several events with promotional airtime equaling \$10,371. Staff donated 276 hours of time for planning and broadcasts. This included The KMTX Red Cross Radio Theatre, a show written and produced by staff as a Red Cross fundraiser; The Carroll College Career Fair; The Komen Montana Race for the Cure; the St. Peter's Health and Fitness Fair; the Caring Foundation of Montana Governor's cup Race; the Last Chance Stampede and Fair; the Carroll College Tailgate party; and the Patriot Day Breakfast.

Yes, 2006 was an extremely busy year for public service. Last year was just as busy. Some events

were not repeated. New ones simply took their place. For the most part, 2007 was a repeat year for KMTX's involvement.

In our opinion there is no need to return to old rules or to generate new ones. The community has access to our station and we more than meet the needs of public service. Mandating costly surveys will not accomplish what an open door, a phone number, and an email address do already.

Returning to a 24-7 manned studio requirement would certainly wound us. Due to the competitive nature of advertising, the loss of local business advertisers to the box store, and the seemingly unlimited number of new station permits, the marketplace has been challenging. Unfortunately, one of our first answers is to cut personnel. In 2008, we eliminated one full-time announcer position. Adding personnel at this time simply to "mind the store" would be devastating. If we in turn thought that it was within our license to cease operations at midnight to save on the power and personnel bills, it would certainly be worth investigating. The true benefit of overnights is not commercial billing (we have none). Overnights build the continuity of the format and added public service. Turning day staff into "night staff" would be an option that would simply damage our ability to coordinate and perform. None of these are advantages when trying to keep radio as a viable career offering.

so often the message of our EEO mandates. While broadcasters strive to upgrade technologies to meet the competitive entertainment environment of the 21st century, we are being dragged back to 20th century mandates when over-the-air broadcasters were America's primary communication and entertainment option.

While KMTX certainly exceeds any probable limits for local and public programming, establishing some formula or minimum invites misinterpretations and minimums. Establishing a number could actually diminish a station's efforts in many instances. Adding a local music requirement would invite public comment, but not likely the positive kind desired by the Commission, the station, or our advertisers.

Our community file is stuffed with thank-you letters from our neighbors, friends, and listeners. Add thank-you calls, conversations, and the occasional cookie tray and we certainly come to the notion that we meet the community's needs.

We are a family-owned station in small town America. We compete against other radio, cable, local television, satellite radio, the Internet, billboards, newspaper, magazines, public bathrooms, and bus stops. In other words, we don't relish the increased regulations and requirements, which would simply diminish our current level of service to our listening public and our advertisers.

Thank you,
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